

1
2
3
4
5
6 **UNITED STATES DISTRICT COURT**
7 **FOR THE WESTERN DISTRICT OF WASHINGTON**

8
9 **JULIE ROBERTS**, individually and on behalf
of all others similarly situated,

10 *Plaintiff,*

11 *v.*

12 **PREMIER TECHNOLOGY SERVICES,
LLC dba REALISTIQ**, a Nevada limited
liability company,

13 *Defendant.*

14 CASE NO.: 2:17-cv-00648

15 **STIPULATION AND [PROPOSED]
ORDER OF DISMISSAL WITH
PREJUDICE WITH RESPECT TO
THE INDIVIDUAL CLAIMS AND
WITHOUT PREJUDICE WITH
RESPECT TO THE CLASS-ACTION
CLAIMS**

16
17 **STIPULATION**

18 Plaintiff, Julie Roberts, individually, and Defendant, Premier Technology Services, LLC
19 dba realistiQ, by and through undersigned counsel, hereby advise the Court that the parties have
20 reached a settlement of their claims, and therefore dismiss Plaintiff's individual claims asserted in
21 this civil action, with prejudice, and *without* prejudice with respect to the putative Class claims,
22 pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). The parties are to bear their own respective attorneys'
23 fees and costs.

24
25 In support of this Stipulation, the Parties jointly attest that the putative Class members will
26 not be prejudiced by the dismissal of this action because, to the best of the Parties' knowledge, 1)

27 **STIPULATION AND [PROPOSED] ORDER OF DISMISSAL**
28 2:17-cv-00648

Law Offices of Stefan Coleman
1011 W. Colter St., #236
Phoenix, Arizona 85013
602.441.3704

1 no putative Class member has relied on this action as no notices have been distributed and there
2 has been no advertisement or publicity of this action; 2) the statute of limitations will not expire
3 for several years; and 3) the Parties' agreement does not settle or concede any interests of the
4 putative Classes. *See Diaz v. Trust Territory of Pac. Islands*, 876 F.2d 1401, 1408 (9th Cir.1989).

5

6 Dated: June 29, 2017

7 By: /s/Blake J. Dugger
One of Plaintiff's Attorneys

8 Blake J. Dugger*
9 blake@stefancoleman.com
LAW OFFICES OF STEFAN COLEMAN, P.A.
10 1011 W. Colter St., #236
Phoenix, Arizona 85013
11 Telephone: (602) 441-3704
Facsimile: (888) 498-8946
12 Attorney for Plaintiff and the Classes
13 **Pro Hac Vice*

14 Dated: June 29, 2017

15 By /s James D. Nelson
By /s Shaina R. Johnson
16 By /s Natalie A. Moore
James D. Nelson, WSBA #11134
Shaina R. Johnson, WSBA #46079
Natalie A. Moore, WSBA #45333
17 BETTS, PATTERSON & MINES, P.S.
One Convention Place, Suite 1400
18 701 Pike Street
Seattle WA 98101-3927
Telephone: (206) 292-9988
21 Facsimile: (206) 343-7053
E mail: jnelson@bpmlaw.com
E mail: sjohnson@bpmlaw.com
E mail: nmoore@bpmlaw.com
22 Attorneys for Defendant Premier Technology
Services, LLC dba realistiQ
23

1 ORDER
2

3 Pursuant to the foregoing Stipulation, it is hereby
4 ORDERED, ADJUDGED AND DECREED that the that the above-captioned proceeding
5 is hereby DISMISSED WITH PREJUDICE with respect to the Plaintiff's claims and without
6 prejudice with respect to the putative Class claims and without costs to any party.
7

8 DATED this 6th day of July, 2017.

9 
10 UNITED STATES DISTRICT JUDGE

11 Presented by:

12 By: /s/Blake J. Dugger
13 One of Plaintiff's Attorneys

14 Blake J. Dugger*
15 blake@stefancoleman.com
16 LAW OFFICES OF STEFAN COLEMAN, P.A.
17 1011 W. Colter St., #236
18 Phoenix, Arizona 85013
19 Telephone: (602) 441-3704
20 Facsimile: (888) 498-8946
21 Attorney for Plaintiff and the Classes
22 **Pro Hac Vice*

BETTS PATTERSON & MINES

By: /s/James D. Nelson
By: /s/Shaina R. Johnson
By: /s/Natalie A. Moore
James D. Nelson, WSBA #11134
Shaina R. Johnson, WSBA #46079
Natalie A. Moore, WSBA #45333
Betts, Patterson & Mines P.S.
One Convention Place, Suite 1400
701 Pike Street
Seattle, WA 98101-3927
Telephone: (206) 292-9988
Facsimile: (206) 343-7053
E-mail: jnelson@bpmlaw.com
E-mail: sjohnson@bpmlaw.com
E-mail: nmoore@bpmlaw.com
Attorneys for Defendant Premier Technology
Services, LLC dba realistiQ